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16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
18

19 MICHAEL LAVIGNE, *et al.*,
20 Plaintiffs,
21 vs.
22 HERBALIFE LTD., *et al.*,
23 Defendants.
24

CASE NO. 2:18-cv-07480-JAK (MRWx)
[Related Case 2:13-cv-02488-BRO-RZ]

**PLAINTIFFS' DECLARATION OF
YANIV ADAR IN SUPPORT OF
APPLICATION FOR LEAVE TO
FILE UNDER SEAL**

Assigned to Hon. John A. Kronstadt,
Courtroom 10B

DECLARATION OF YANIV ADAR

I, Yaniv Adar declare as follows:

1. I am a partner in the law firm of Mark Migdal & Hayden and I am admitted to practice before this Court. I am counsel of record for Plaintiffs PATRICIA RODGERS, JENNIFER RIBALTA, and IZAAR VALDEZ (collectively referred to as "Plaintiffs"). If called as a witness, I could and would testify competently to the information set forth herein.

2. On November 17, 2020, I emailed counsel for Herbalife to inquire if it was standing on its confidentiality designations with respect to a single document.

3. Counsel for Herbalife requested that the document at issue be lodged under seal.

4. Plaintiffs disagree with Defendant's counsel as to the confidentiality of those documents.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 30th day of November, 2020 at Miami, Florida.

DATED: November 30, 2020 Respectfully submitted,

Mark Migdal & Hayden

By: /s/ Yaniv Adar

Yaniv Adar

Attorneys for Plaintiffs Patricia Rodgers,
Jennifer Ribalta, and Izaar Valdez

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